

EDWARD STONE LAW

MEMO ENDORSED

March 2, 2021

VIA ECF

Honorable William H. Pauley III
United States District Judge
United States District Court
Southern District of New York
Daniel Patrick Moynihan Courthouse
500 Pearl Street
New York, New York 10007

Application Granted. The deadline to submit the joint pre-trial order is extended to April 29, 2021. The final pre-trial telephonic conference is adjourned from March 25, 2021 at 2:00 p.m. to May 14, 2021 at 11:00 a.m. The dial-in number for the conference is (888) 363-4749. The access code is 3070580. No further extensions will be granted absent extraordinary cause.

Re: *Lori Gjenashaj, et al. v. City of New York, et al.*, 19 Civ. 4142 (WHP) (GWG)

Your Honor:

The attached letter motion is dated March 1, 2021 but we were unable to file it yesterday due to problems with the Southern District of New York ECF system.

Respectfully submitted,



Edward S. Stone

ESS/jsp

Dated: March 2, 2021
New York, New York

SO ORDERED:


WILLIAM H. PAULEY III
U.S.D.J.

EDWARD STONE LAW

March 1, 2021

VIA ECF

Honorable William H. Pauley III
United States District Judge
United States District Court
Southern District of New York
Daniel Patrick Moynihan Courthouse
500 Pearl Street
New York, New York 10007

Re: *Lori Gjenashaj, et al. v. City of New York, et al.*, 19 Civ. 4142 (WHP) (GWG)

Your Honor:

I am writing with consent from Defendants' counsel, Brachah Goykadosh, Senior Counsel in the Office of James E. Johnson, Corporation Counsel of the City of New York, to respectfully request that the Court extend the deadline for filing the proposed joint pre-trial order and adjourn the final pre-trial conference.

The reason for this request is that I have been unexpectedly detained on an unrelated matter in Federal Court and require more time to prepare Plaintiff's portion of the pre-trial order. This is the second request for an extension of time to file the joint pre-trial order; the first request was granted.

The parties have conferred. Plaintiff hereby respectfully requests that the Court extend the date by which the joint pre-trial order is due from March 18, 2021 to April 29, 2021, with the understanding that Plaintiff will provide her portion to Defendants by March 26, 2021; and that the Court adjourn the final pre-trial conference from March 25, 2021 to any time on May 6, 2021 or any other time convenient for the Court.

Thank you for your consideration.

Respectfully submitted,



Edward S. Stone

ESS/jsp

175 W. Putnam Avenue
2nd Floor
Greenwich, CT 06830
Tel (203) 504-8425

Edward Stone Law P.C.
Email: eddie@edwardstonelaw.com
www.EdwardStoneLaw.com
Fax (203) 348-8477

300 Park Avenue
12th Floor
New York, NY 10022
Tel (646) 933-3143